



Angie Bond-Simpson
Resource Management
PAB352 | P.O. Box 52025
Phoenix, AZ 85072-2025
P: (602) 236-2082
Angie.Bond-Simpson@srpnet.com | srpnet.com

11/03/2023

Bureau Of Reclamation
Attn: LTEMP SEIS Project Manager
125 South State Street, Suite 800
Salt Lake City, UT 84138

Via Email Only -- LTEMPSEIS@usbr.gov

RE: NOTICE OF INTENT TO PREPARE A SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE DECEMBER 2016 RECORD OF DECISION ENTITLED GLEN CANYON DAM LONG-TERM EXPERIMENTAL AND MANAGEMENT PLAN (NOI) – 88 FR 191, October 4, 2023

The Salt River Project Agricultural Improvement and Power District (SRP) is a community based, not-for-profit organization, providing affordable, reliable water and power to more than two million people in Arizona. SRP has a long history of cooperation with the U.S. Bureau of Reclamation (Reclamation) and Department of the Interior (DOI) on a wide variety of issues, including Cooperating Agency status with Reclamation and the National Park Service (NPS) on the Glen Canyon Dam Long Term Experimental and Management Plan (LTEMP) Supplemental Environmental Impact Statement (SEIS). SRP holds a Colorado River Storage Project hydropower allocation and an exchange agreement with Western Area Power Administration (WAPA) that relies on sufficient generation at Glen Canyon Dam (GCD) to facilitate the energy exchange.

Reclamation issued a Notice of Intent (NOI) to prepare a Supplemental EIS for the GCD LTEMP on October 4, 2023.¹ SRP acknowledges the importance of protected species and recognizes the risks associated with smallmouth bass and other non-native fish proliferation in the river reaches below Lees Ferry. However, SRP believes strongly that alternatives other than flow modification should be considered. SRP relies on GCD hydropower as part of its overall portfolio to provide reliable electric service to over 2 million customers in the Phoenix area, and the proposed flow options create a serious concern that SRP may not be able to maintain the same level of reliability, particularly at summer peak conditions. For this reason, SRP appreciates the opportunity to provide the following comments on the Notice of Intent (NOI).

Background: The NOI states that “the thermal conditions in the river ... are now conducive for smallmouth bass reproduction and establishment.” It further states that in August 2022, Reclamation, through the Secretary of Interior’s designee to the Adaptive Management Work Group (AMWG) with the AMWG’s advisement, must “identify and analyze operational alternatives at Glen Canyon Dam that may serve to disrupt spawning of smallmouth bass and other warm water invasive fish that pass through the dam.” Under this direction, Reclamation issued the draft Glen Canyon Dam/Smallmouth Bass Flow

¹ [NOI – 88 FR 191, October 4, 2023](#)

Options Draft Environmental Assessment (EA) in February of 2023(Draft EA).² SRP appreciates Reclamation’s recognition that a more robust analysis was appropriate in this circumstance, and SRP values the opportunity to comment on the GCD LTEMP SEIS.

Purpose and Need: The background information provided in the NOI is used to support the Purpose and Need statement for the proposed LTEMP SEIS: the Purpose being “to analyze additional flow options in response to invasive smallmouth bass and other warm water non-native fish detected directly below the dam,” and the Need being “to prevent the establishment of smallmouth bass below Glen Canyon Dam.” While additional flow options may need review, alternative methods for mitigation and prevention should also be considered. Flow options are not the only alternatives available, nor are they established as the most effective and efficient alternatives.

Alternatives to be considered: The NOI states that “reductions in water temperature combined with changes in flow velocity may be vital tools that can be used to disrupt smallmouth bass from successfully spawning and establishing a population,” and therefore “a range of reservoir releases with temperature and flow velocity combinations will be analyzed to determine efficacy of their ability to disrupt and prevent smallmouth bass spawning behavior.”

SRP believes that other alternatives are likely to be more effective than flow changes in disrupting smallmouth bass proliferation. In riverine environments, small mouth bass typically spawn in off-channel waters (e.g., backwaters and sloughs) where little, if any, flow exists. As observed in the Lees Ferry reach below GDC, these waters are notably higher in temperature than the main channel. The alternative flows that utilize steady “bypass flows” to decrease riverine temperatures below 16 degrees Celsius may not sufficiently affect temperatures in these off-channel waters to preclude small mouth bass spawning, as warmer aquatic refugia will almost always be available. SRP has concerns that all of the bypass flow options could have an impact on the power production at times when power is needed most, i.e., at times of peak electricity demand.

SRP strongly recommends studying alternatives that do not modify bypass flows or disrupt hydrogeneration. For example, Reclamation should develop alternatives for the LTEMP SEIS that include preventing entrainment through reservoir elevation manipulation, thermal curtain or barrier net, habitat modifications, and addressing the -12-mile slough where the smallmouth bass and other invasive fish spawn.

If Reclamation must consider a flow-based alternative, SRP supports including an option that avoids bypass assuming the option does not reduce hydrogeneration at times of peak demand when it is most challenging and costly to maintain reliability. Alternatives could consider temporarily altering the flow to increase hydrogeneration during peak needs on a day ahead or week ahead basis.

Additionally, SRP would recommend no implementation of bypass flow-related options until it reviews and fully analyzes impacts related to emissions, economics, finances, grid reliability, health and safety, and power markets.

² SRP submitted comments in March 2023

Summary of expected impacts:

SRP remains concerned the four options Reclamation analyzed in the Draft EA which focused solely on bypass flows will be considered again in this LTEMP SEIS. SRP reviewed those options and determined that each option could potentially disrupt power production at critical times when the power is needed most. In its SRP March 2023 Comments, SRP detailed the current power production risks SRP is managing and the impacts a power disruption at GCD would have on power reliability. The concerns SRP described in February continue to apply despite significant efforts to mitigate those risks.

Schedule: The NOI schedule proposes a review of the Draft LTEMP SEIS in the winter of 2023 and into 2024, with Reclamation issuing and implementing the Final Record of Decision in the early summer of 2024. As previously noted, SRP plans its load and generation five years in advance – the current iteration of which includes GDC hydropower. To implement a change as impactful to hydropower generation as the proposed flow alternatives that utilize bypass in such short-term notice, commencing the summer season of 2024, creates a significant risk that SRP may not have sufficient resources to meet reliability needs. In addition, power market conditions have tightened considerably due to resource retirements across the west, and surplus power is not typically available on summer peak days.

Cooperating agency: SRP appreciates Reclamation inviting the cooperating and co-lead agencies who participated in the LTEMP EIS process to also participate in the LTEMP SEIS process. SRP accepts and appreciates the opportunity to serve in this manner and to develop an option to achieve the goals described in the purpose and need without disrupting critical the critical hydropower function GCD serves.

SRP agrees with the importance of protecting native species and impeding the expansion of invasive fish below GCD. However, policies to address smallmouth bass must be balanced with potential disruptions to GCD's critical hydropower function and the very real impacts to millions of power users, including economics, reliability, and health and safety. SRP commends Reclamation for including broad participation in the process and looks forward to the opportunity to work with Reclamation and other stakeholders in developing alternative approaches to prevent the establishment of smallmouth bass below GCD without disrupting the critical role that this resource plays in maintaining reliable power to millions of SRP customers.

Sincerely,



Angie Bond-Simpson, Senior Director
Resource Management
Salt River Project